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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

UNITED STATES OF AMERICA, Plaintiff, v. ALLISON MARIE BAVER, Defendant.	DEFENDANT’S WITHDRAWAL OF OBJECTION TO PARAGRAPH 67 OF THE PRESENTENCE REPORT AND THE TWO-LEVEL ADJUSTMENT FOR OBSTRUCTION OF JUSTICE PURSUANT TO §3C1.1 Case No. 2:21-cr-00520-001 JNP
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Defendant, Allison Marie Bayer, (“Ms. Bayer”), by and through her attorneys of record, Kristen R. Angelos, Robert K. Hunt, and Robert Steele, hereby withdraws her objection to paragraph 67 of the Presentence Report which assesses a two-level adjustment pursuant to §3C1.1. *See Defendant’s Objections to Presentence Report and Sentencing Memorandum*, Sealed Doc. No. 225, pgs. 16-17. After further review and research, it appears that the two-level adjustment is appropriate pursuant to §3C1.1, Application Note 8. *See also, United States v. Roybal*, 188 F. Supp. 3d 1163, 1211-1212 (D.N.M. 2016)1211-1212. However, Ms. Bayer asserts that the issue of whether or not contempt in this instance is a misdemeanor or felony is

still an issue. For example, if it is a misdemeanor, a special assessment of \$25.00 will be imposed.

RESPECTFULLY SUBMITTED this 9th day of October, 2024.

/s/ Kristen R. Angelos
KRISTEN R. ANGELOS
Assistant Federal Public Defender

/s/ Robert K. Hunt
ROBERT K. HUNT
Assistant Federal Public Defender

/s/ Robert L. Steele
ROBERT L. STEELE
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